

To: William Miller, District Engineer, Los Angeles District, U.S. Army Corps of Engineers[William.H.Miller@usace.army.mil]; Sallie Diebolt, Chief, Arizona Branch, U.S. Army Corps of Engineers[Sallie.Diebolt@usace.army.mil]
Cc: Brush, Jason[Brush.Jason@epa.gov]; Scott Richardson, Supervisory Fish & Wildlife Biologist, U.S. Fish and Wildlife Service[Scott_Richardson@fws.gov]
From: LSPWA
Sent: Fri 6/12/2015 8:21:58 PM
Subject: Proposed Vigneto Development near Benson, Arizona

June 12, 2015

Dear Mr. Miller and Ms. Diebolt,

The Lower San Pedro Watershed Alliance consists of 95 landowners and 100 supporting individuals and agency/NGO representatives who are dedicated to protecting the threatened river ecosystem of the lower San Pedro river. We are very concerned about the proposed Vigneto development, located near Benson, Arizona.

As resident conservationists of this river, we are well aware of the status held by the lower San Pedro watershed in providing a default repository for mitigation of major impacts to other riparian areas that have taken place in the growth areas of Arizona. It is imperative that these mitigation designations, which were made in good faith by federal agencies, as well as over a half-million acres of other conservation investments and currently sustainable working landscapes in this watershed, be taken very seriously in any planning effort for a major new development. The Vigneto development is planned to consume over ten times the water currently used by the town of Benson, while increasing population in that rural community by an even greater factor.

The potential impacts to water resources in this conservation corridor must be evaluated to a much higher degree than has taken place thus far. We support Tucson Audubon Society's request to the Army Corps of Engineers to re-evaluate the Clean Water Act Section 404 permit, initiate consultation with the USFWS to quantify potential impacts of Vigneto to threatened and endangered species, and ensure commitments to adequate conservation and mitigation measures. To do otherwise will significantly reduce the credibility of the ACE in its role to protect current and future mitigation designations and conservation investments in this increasingly rare desert river ecosystem.

Thank you for considering these comments during this important and potentially historic review process.

Sincerely,

Peter Else, chair
On behalf of the Lower San Pedro Watershed Alliance

Ex. 6 - Personal Privacy

LowerSanPedro.org